

**LAW OFFICE OF ABEL L. PIERRE  
ATTORNEY-AT-LAW, P.C.**

140 BROADWAY, 46<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10005

TEL: (212) 766-3323

FAX: (212) 766-3322

[abel@apierrelaw.com](mailto:abel@apierrelaw.com)

[www.apierrelaw.com](http://www.apierrelaw.com)

November 9, 2020

**VIA ECF**

Hon. Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **Sandra Klaus v. M&T Bank Corporation et al**  
**Case 1:20-cv-06179-PAE**  
**Request to Adjourn Initial Conference**

Dear Judge Engelmayer:

As this court is aware, the undersigned is counsel for Plaintiff in the above referenced action.

I write to request an adjournment of the Initial Status Conference scheduled for November 12, 2020 at 2:30am. No previous requests for an adjournment of this conference have been requested or granted.

I make this adjournment request because I have school-aged children. Due to the restrictions caused by the COVID-19 pandemic and underlying health conditions, my children are enrolled in remote learning. The restrictions and requirements in their remote learning schedule are such that I must directly supervise their schooling all day on Tuesdays and Thursdays. This environment is not conducive to a telephonic conference with the court.

I am working and available on Mondays, Wednesdays and Fridays.

Counsels for the Defendants consent to the adjournment request. Counsel are available on the following dates and times:

11/16/2020-- 11:00am to 5:00pm; and

11/20/2020-- 12:00pm noon to 4:00pm.

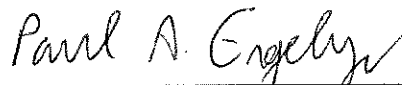
Counsel is not available on 11/13/2020 or 11/27/2020, but are available on Mondays, Wednesdays and Fridays thereafter. Kind regards for the court's courtesy in this matter

Respectfully submitted,



Abel L. Pierre, Esq.  
Attorney for Plaintiff

Granted. The Initial Conference in this case, currently scheduled for November 12, 2020 at 2:30 pm, is adjourned to November 16, 2020 at 11:30 am. SO ORDERED.



PAUL A. ENGELMAYER  
United States District Judge  
11/10/2020